

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ODS CAPITAL LLC, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

JA SOLAR HOLDINGS CO., LTD.,
BAOFANG JIN, and SHAOHUA JIA,

Defendants.

Case No. 1:18-cv-12083-ALC

CLASS ACTION

**CO-LEAD PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT**

Pursuant to Fed. R. Civ. P. 23(e), Co-Lead Plaintiffs Altimeo Asset Management and ODS Capital LLC (“Plaintiffs”), individually and on behalf of all Settlement Class Members, hereby move this Court for an order: (i) granting preliminary approval of the proposed Settlement; (ii) certifying the proposed Settlement Class; (iii) granting approval of the form and manner of giving notice of the proposed Settlement to the Settlement Class Members; and (iv) setting a date for a Settlement Hearing and deadlines for the mailing and publication of the Notice, Settlement Class Member objections and opt-out notices, the filing of Plaintiffs’ motion for Final Approval of the Settlement, and the filing of Co-Lead Counsel’s application for an award of attorneys’ fees and reimbursement of expenses and compensatory awards to Plaintiffs.

This motion is based upon the accompanying Memorandum of Law and Stipulation of Settlement, with its Exhibits, and the Declaration of Michael Grunfeld and the exhibits thereto that are filed contemporaneously herewith, and other such matters and argument as the Court may consider.

Significantly, Defendants do not oppose the relief sought by this motion.

Dated: January 23, 2022

Respectfully submitted,

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